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UNITED STATES DISTRICT COURT

CLARK COUNTY, NEVADA

JASON SPANEL.

Plaintiff,

VS.

USAA CASUALTY INSURANCE COMPANY,
DOES I through X, inclusive; and ROE
CORPORATIONS I through X, inclusive

CASE NO.: 2:25-cv-00291-CDS-MDC

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(FIRST REQUEST)**

Plaintiff, JASON SPANEL (“Plaintiff”) and Defendant USAA CASUALTY INSURANCE COMPANY (“Defendant”) by and through their counsel, hereby stipulate and agree, subject to the Court’s approval, to extend certain discovery and pre-trial deadlines. This is the first request to modify the Amended Proposed Joint Discovery Plan and Scheduling Order [ECF No. 16].

J.

THE FOLLOWING DISCOVERY HAS BEEN COMPLETED

1. Plaintiff has served his Disclosure of Witnesses and Documents Pursuant to FRCP 26(a)(1) on April 1, 2025.
2. Plaintiff set the Deposition of Defendant's Expert David Eli Fish, MD, MPH for June 17, 2025;

II.

THE FOLLOWING DISCOVERY REMAINS TO BE COMPLETED

1. Defendant's Disclosure of Witnesses and Documents Pursuant to FRCP 26(a)(1);
2. The Deposition of Defendant's FRCP 30(b)(6) Representative;
3. Depositions of fact witnesses;
4. Disclosure of experts;
5. Depositions of expert witnesses;
6. Written discovery, including resolution of ongoing discovery disputes which the parties are working together to resolve without further Court intervention;
7. Any other potential depositions or written discovery which may become necessary as discovery continues.

III.

REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED

The parties held Meet and Confer meeting on May 21, 2025, to discuss ongoing discovery issues. The parties have been working together to which the parties were able to come to an agreement on without court intervention. Plaintiff has recently associated Kimball Jones Esq., and Joshua P. Berrett, Esq., of BIGHORN LAW. Counsel for all parties have been working together to obtain additional information and documents and schedule necessary depositions. Additional time will be needed following the depositions to obtain the transcripts and allow the experts ample time to review the testimony. The parties wish to extend the discovery deadlines to allow more complete discovery prior to the disclosure of experts so as to minimize the need for supplemental expert reports as well as time to discuss settlement negotiations. The parties mutually agree, subject to the Court's approval, to a ninety (90) day extension of all discovery related deadlines. The requested extension will allow adequate time to complete all remaining

1 discovery without the need of future extensions.

2 The Parties agree that no Party will be prejudiced by the requested amendment to the
 3 Scheduling Order and that such an extension was not brought for any improper purposes.
 4

5 **IV.**

6 **PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY:**

7 The Parties respectfully request that this Court enter an Order setting the following
 8 schedule for all remaining discovery:
 9

	Current Date	Proposed Date
10 Final Dates for Initial Experts	June 12, 2025	September 10, 2025
11 Final Dates for Rebuttal Experts	July 12, 2025	October 10, 2025
12 Close of Discovery	August 11, 2025	November 10, 2025
13 Final Date to File Dispositive Motions	September 10, 2025	December 9, 2025

15 Respectfully submitted by:
 16

DATED this 22nd day of May 2025.

BIGHORN LAW

/s/Joshua P. Berrett

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Attorneys for Plaintiff

DATED this 22nd day of May 2025.

HANSEN & HANSEN

/s/Jonathan Hansen

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*Attorneys for Defendant USAA Casualty
Insurance Company*

ORDER

Based on the foregoing, it is hereby ORDERED, ADJUDGED AND DECREED that the following deadlines are hereby approved and adopted:

Final Dates for Initial Experts	September 10, 2025
Final Dates for Rebuttal Experts	October 10, 2025
Close of Discovery	November 10, 2025
Final Date to File Dispositive Motions	December 9, 2025

IT IS SO ORDERED. If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order. The disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections to them must be included in the joint pretrial order

UNITED STATES MAGISTRATE JUDGE

DATED: 5-22-25